

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JASON ZIMMERMAN, on behalf of himself and )  
all others similarly situated, ) Civil Action No. 7:09-cv-04602 (PGG)  
)  
Plaintiff, )  
)  
-against- )  
)  
PORTFOLIO RECOVERY ASSOCIATES, LLC, )  
)  
Defendants. )

**DECLARATION OF SERGEI LEMBERG  
IN SUPPORT OF MOTION FOR CLASS CERTIFICATION**

I, **SERGEI LEMBERG** declare as true the following:

1. I am the founder, principal, sole member and manager of Lemberg & Associates, L.L.C., of Stamford, Connecticut, and have been retained, by the Plaintiff Jason Zimmerman to represent his interests against the Defendant and have been instructed by Mr. Zimmerman to seek class certification from the Court.

2. I have personal knowledge as to all matters set forth in this Declaration.

3. I graduated from the University of Pennsylvania Law School in 2001. I am an attorney licensed to practice law before all of the State courts and Federal District Courts within New York, Connecticut and Massachusetts. I became a member of the New York and Massachusetts State bars in 2002. I became a member of the Connecticut State Bar in 2005, and have been admitted to appear before the First, Third and Ninth Circuit Court of Appeals.

4. My practice focuses on consumer protection litigation in both state and federal courts. I have practiced as a consumer law attorney since 2006.

5. My firm has prosecuted over four thousand consumer rights actions throughout the country and prosecutes consumer class actions.

6. My firm resume is attached hereto as Exhibit 1.

7. My firm is committed to the prosecution of this case on behalf of the proposed class and the proposed class representative and will continue to use our experience and resources to that end.

8. Mr. Zimmerman has been counseled on his duties and obligations if this action were to be certified by the Court.

9. Mr. Zimmerman has been an active participant in the prosecution of his case.

10. He has fully cooperated with all phases of discovery, responding to discovery demands and making himself available for deposition.

Dated: February 18, 2011

By: /s/ Sergei Lemberg  
Sergei Lemberg